

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON, DIVISION

In re §  
KEY ACCESS INSTITUTE, LLC, § Chapter 7  
Debtor. §  
§ Case No. 17-31568-H4-7

**PETITION FOR VOLUNTARY DISMISSAL  
and  
NOTICE OF EXPEDITED HEARING**

**This Petition seeks an order that may adversely affect you. If you oppose the petition, you should immediately contact the Petitioner to resolve the dispute. If you and the Petitioner cannot agree, you must file a response and send a copy to the Petitioner. This Petition is set for expedited hearing on March 29, 2017 at 1:45 P.M. in the United States Federal Courthouse located at 515 Rusk, Houston, Texas 77002 in Room 600. If you oppose this Petition, you must file a response before that hearing and state why the Petition should not be granted. If you do not file a timely response, the relief may be granted without further notice to you. If you oppose the Petition and have not reached an agreement with the Petitioner, you must attend the hearing. Unless the Petitioner, the creditors and other parties agree otherwise, the court may consider evidence at the hearing and approve the Petition at the hearing. Represented parties should act through their attorney.**

The Debtor in the above-mentioned case hereby moves to voluntarily dismiss its bankruptcy case for the following reasons:

1. Debtor filed a voluntary petition under Chapter 7 of the Bankruptcy Code on March 10, 2017.
2. No complaints objecting to discharge or to determine the dischargeability of any debts have been filed in the case as of the date of the filing of this Petition for Voluntary Dismissal.
3. Debtor, in its regular course of business receives, maintains and retains patient records and files protected by various federal statutes, including HIPPA. Debtor also holds human body parts for training purposes.
4. On March 10, 2017, the date of filing for bankruptcy relief, Debtor had reasonable cause to believe that such patient records and files were at risk of seizure. As of the date of filing

this motion, all patient records and files are secure. Debtor now realizes that relief from automatic stay is no longer necessary. Debtor intends to pursue other means of handling its debts.

4. No creditor has filed a claim in this case.
5. No creditor has requested relief from any automatic stay.
6. All creditors will be delivered of notice for the expedited hearing set on March 29, 2017 at 1:45 P.M. for hearing on Debtor, Key Access Institute, LLC's Petition for Voluntary Dismissal.

WHEREFORE, Debtor prays that this bankruptcy case be dismissed without prejudice.

Respectfully Submitted:

LAW OFFICE OF MOIRA RANKIN COOPER  
/s/Moira Cooper

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§

**ORDER GRANTING VOLUNTARY DISMISSAL**

AND NOW, this \_\_\_\_\_ day of \_\_\_\_\_, 2017, the Court having found that the voluntary dismissal of this case is in the best interests of the Debtor and does not prejudice the rights of any of its creditors,

It is hereby ORDERED that the petition for voluntary dismissal is approved.

Date: \_\_\_\_\_, 2017.

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U.S. Bankruptcy Judge